

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CYMBIDIUM RESTORATION TRUST,

Plaintiff,

v.

AMERICAN HOMEOWNER
PRESERVATION TRUST SERIES AHP
SERVICING; its Trustee, U.S. BANK TRUST
N.A.; AHP CAPITAL MANAGEMENT, LLC;
AMERICAN HOMEOWNER
PRESERVATION SERIES 2015A+; its
Trustee, U.S. BANK TRUST NATIONAL
ASSOCIATION; AHP SERVICING, LLC; and
JORGE NEWBERY,

Defendants.

AMERICAN HOMEOWNER
PRESERVATION TRUST SERIES AHP
SERVICING.; AHP CAPITAL
MANAGEMENT, LLC; AMERICAN
HOMEOWNER PRESERVATION SERIES
2015A+; and; AHP SERVICING, LLC;

Counter-Plaintiffs,

v.

CYMBIDIUM RESTORATION TRUST,

Counter-Defendant.

No. 2:24-CV-00025-JNW

STIPULATED MOTION AND
[~~PROPOSED~~] ORDER CONTINUING
FRCP 26(a)(2) EXPERT DISCLOSURE

NOTE ON MOTION CALENDAR:
November 12, 2024

STIPULATED MOTION AND [~~PROPOSED~~] ORDER
CONTINUING FRCP 26(a)(2) EXPERT DISCLOSURE - 1
(No. 2:24-CV-00025-JNW)

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

VAK CAPITAL TRUST I,

Intervenor-Defendant and
Counterclaim and
Crossclaim Plaintiff,

v.

CYMBIDIUM RESTORATION TRUST;

Counter-Defendant; and

AHP CAPITAL MANAGEMENT, LLC; and
AMERICAN HOMEOWNER
PRESERVATION SERIES 2015A+;

Cross-Defendants.

COME NOW the Plaintiff Cymbidium Restoration Trust (“Cymbidium”), Defendants American Homeowner Preservation Trust Series AHP Servicing, American Homeowner Preservation Trust Series 2015A+, AHP Capital Management, LLC, and AHP Servicing, LLC (collectively “AHP Entities”) and Intervenor VAK Capital Trust I (“VAK”) and hereby stipulate and agree to continue the FERCP 26(a)(2) deadline for disclosing expert testimony in this matter from November 12, 2024 to December 3, 2024. There is good cause to extend these case deadlines in order to permit additional time for ongoing meet and confers and follow-up discovery.

For the foregoing reasons, the parties jointly agree that there is good cause to continue the FRCP 26(a)(2) deadline for disclosing expert testimony to December 3, 2024.

1 DATED this 12th day of November, 2024.

2 I certify that this memorandum contains 117
3 words, in compliance with the Local Civil Rules.

4 CORR CRONIN LLP

5 s/Jeffrey B. Coopersmith

6 Jeffrey B. Coopersmith, WSBA No. 30954
7 1015 Second Avenue, Floor 10
8 Seattle, Washington 98104-1001
9 Ph: (206) 625-8600
10 jcoopersmith@corrchronin.com

11 KMA ZUCKERT LLP

12 s/ Brian J. Benoit

13 Brian J. Benoit (admitted *pro hac vice*)
14 227 West Monroe Street, Suite 3650
15 Chicago, Illinois 60606
16 Ph: (312) 345-3065
17 bbenoit@kmazuckert.com

18 *Attorneys for Defendants/Counter-Plaintiffs*

19 BYRNES KELLER CROMWELL LLP

20 s/ Bradley S. Keller

21 Bradley S. Keller, WSBA # 10665
22 1000 Second Avenue, 38th Floor
23 Seattle, Washington 98104
24 Telephone: (206) 622-2000
25 Facsimile: (206) 622-2522
bkeller@byrneskeller.com

Attorneys for Plaintiff/Counter-Defendant

BARG SINGER HOESLY PC

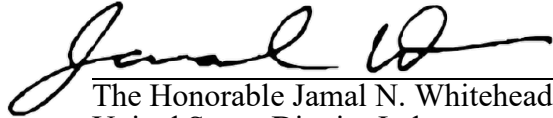
s/ Cody Hoesly

Cody Hoesly, WSBA #41190
121 SW Morrison St., Suite 600
Portland, Oregon, 97204
Ph.: (503) 241-3311
choesly@bargsinger.com

Attorneys for Intervenor

1 IT IS SO ORDERED.

2 DATED this 14th day of November, 2024.

3
4 
5 The Honorable Jamal N. Whitehead
6 United States District Judge
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25